UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

SHELTON OLIVER, et al., individually and on behalf of all others similarly situated,

Plaintiffs,

v.

Civil Action No. 17-cv-12979-CCC-MF

BMW OF NORTH AMERICA, LLC,

Defendant.

PLAINTIFFS' UNOPPOSED MOTION FOR AN AWARD OF ATTORNEYS FEES, REIMBURSEMENT OF EXPENSES AND SERVICE AWARD TO CLASS REPRESENTATIVES

PLEASE TAKE NOTICE THAT on February 18, 2021, pursuant to the Preliminary Approval order entered August 21, 2020 (ECF Doc. 30) in the within action, Plaintiffs Shelton Oliver, Donnie Baker, and Khader Mohiuddin (collectively, "Plaintiffs" or "Class Representatives") will move before the Honorable Mark Falk, U.S.M.J. of the United States District Court for the District of New Jersey, located at located at Frank Lautenberg Post Office & Courthouse, 2 Federal Square, Newark, New Jersey 07101 for an Order granting the motion for an award of attorneys fees, reimbursement of expenses and payment of service award to Class Representatives, pursuant to the terms of the Settlement Agreement dated July 14, 2020 and for such other and further relief as to the Court appears just and proper.

In support thereof, Plaintiffs contemporaneously file a Memorandum of Law, the Joint Declaration of Class Counsel, the Declaration of Gary S. Graifman and the Declaration of Thomas P. Sobran, with exhibits thereto.

For the reasons set forth in the Memorandum of Law, Plaintiffs respectfully request that the Court grant the Motion.

Dated: December 2, 2020 Respectfully submitted,

KANTROWITZ, GOLDHAMER & GRAIFMAN, P.C.

/s/ Gary S. Graifman
Gary S. Graifman, Esq.
Jay I. Brody, Esq.
210 Summit Avenue
Montvale, New Jersey 07645
Telephone: (201) 391-7000

THOMAS P. SOBRAN, P.C.

Thomas P. Sobran (pro hac vice) 7 Evergreen Lane Hingham, MA 02043 Telephone: (781) 741-6075

Interim Class Counsel for the Conditionally Certified Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of December, 2020, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's electronic filing system (CM/ECF) upon all counsel of record.

s/ Gary S. Graifman

Gary S. Graifman, Esq.